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BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon
JUDITH R. HARPER, OSB #903260
Judi.Harper@usdoj.gov
Assistant United States Attorney
310 West Sixth Street
Medford, Oregon 97501
Telephone: (541) 776-3564
Attorneys for the United States

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$54,810.00 U.S. CURRENCY, *in rem*,

Defendant.

1:20-mc-01194-CL
UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Peter Carini, attorney for claimant Travis Barnes, who concurs with this extension.

On August 31, 2020, Travis Barnes filed a claim in a non-judicial civil forfeiture proceeding by the Customs and Border Protection to \$54,810.00 U.S. Currency seized from Travis Barnes on or about June 25, 2020.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Travis Barnes, agree to extend the time in which the United States will file a complaint for forfeiture against the

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\$54,810.00 U.S. Currency or to obtain an indictment alleging that the assets are subject to forfeiture. Travis Barnes agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Thursday, February 25, 2021.

Travis Barnes agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until February 25, 2021, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Travis Barnes shall not seek its return for any reason in any manner.

DATED: November 19, 2020

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period
and a proposed Order on the party herein by sending via email on November 19, 2020 to:

Peter Carini
carinilaw@gmail.com
Attorney for claimant Travis Barnes

s/Dawn Susuico
DAWN SUSUICO
Paralegal